

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

IN RE:	§	Case No. 24-60504-JPS-11
	§	
ERIC RALLS¹	§	Chapter 11 Subchapter V
	§	
DEBTOR	§	

**AMENDED PRE-HEARING STATUS CONFERENCE REPORT FOR
THE DEBTOR ERIC RALLS**

ERIC RALLS, one of the debtors in the above-referenced joint bankruptcy case (the “Debtor”), files this Amended Pre-Hearing Status Report, per the order entered and would respectfully show the Court as follows:

1. On August 18th, 2024 (the “Petition Date”), the Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Eastern District of Texas, Tyler Division (the “Bankruptcy Court”).
2. On September 25th, 2024, Meeting of Creditors 341(a) meeting [Dkt. #6] was continued to October 9th, 2024.
3. On September 25th, 2024, the Debtor filed Amended Schedules [Dkt. #14], Amended Statement of Affairs [Dkt. #15], and Declaration [Dkt. #16].
4. On October 17th, 2024, Order granting Joint Administration was entered [Dkt. #21].
5. On October 28th, 2024, the Notice of Status conference has been set for December 10th, 2024 [Dkt. #23]. The date for submitting this report was November 26th, 2024. The debtor’s counsel missed this date due to a medical emergency.

¹ The last four digits of the Debtor’s Social Security numbers are (0447).

6. On October 31st, 2024, a Motion to Continue Hearing the Status Conference was entered [Dkt. #26].

7. On November 4th, 2024, an Order granting a Motion for Continuation was entered, and the hearing was continued until December 17th, 2024 [Dkt. #27].

FACTUAL BACKGROUND

8. The Debtor is an individual consumer filing under Chapter 11 of Title 11, a small business debtor according to the definition in the Bankruptcy Code, and qualified for Subchapter V of Title 11.

9. On October 17th, 2024, the Court granted the Debtors' motion for joint administration of Bankruptcy Estates [Dkt. #21]

10. On November 19th, 2024, Counsel suffered a medical emergency and was admitted to the hospital until the end of December 6th, 2024.

11. On November 22nd, 2024, Creditor PlantSnap, Inc. filed an adversary complaint Cause No. 24-06044 [Dkt. #29] and Creditor HI Investments, LLC, filed an adversary complaint Cause No. 24-06045 [Dkt. #31].

12. On November 25th, 2024, Creditor DEJ Partners, LLC, filed an adversary complaint Cause No. 24-06047 [Dkt. #33].

13. The Debtor must delay preparing the reorganization plan to address the adversary claims against it and the source of income required for the plan to succeed.

14. The Debtor owns an application for patent-pending processes focused on nature, the preservation of species, and the global environment. The Debtor requires nunc pro tunc to allow continued negotiations for a marketing arrangement that promises the ability to exploit the provisional patents. The patent is under provisional application, and the development agreement

is to remain on Amazon servers (“AWS”). The application is in the pre-launch phase and awaiting a final negotiation settlement for its launch.

15. The Debtors proposed plan to be negotiated with the parties in interest is as follows:
- a. Negotiate with the secured creditors regarding the allowed secured claim and obtain a Court order approving the final settlement.
 - b. Propose a plan where the allowed secured claim is paid in full, with a plan for payment of 100% of allowed unsecured claims, with the Debtor retraining the balance.
 - c. Propose a plan where pre-petition settlement agreements are assumed to cure defaults. If attempted enforcement against non-affiliates is sought, seek to enforce automatic stay to prevent interruption of Debtor operations.

WHEREFORE, the Debtor respectfully requests the acceptance of this amended pre-status report. Debtors, in the interim, will prepare motions to implement the above plan so that by the status conference, the motions will be pending.

Dated: December 10th, 2024.

Respectfully submitted,

THE WILEY LAW GROUP, PLLC

/s/ Kevin S. Wiley, Sr.

Kevin S. Wiley, Sr.

Texas State Bar No. 21470700

325 N. St. Paul Street, Suite 2250

Dallas, TX 75201

Tel. (214) 537-9572

Fax (972) 449-5717

kwiley@wileylawgroup.com

Counsel for Joint Debtors,

EarthSnap, Inc. and Eric Ralls

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of this Amended Status Report were forwarded to the Subchapter V Trustee, the U.S. Trustee, and the Creditors on the attached mailing list via electronic mail on this 10th day of December 2024.

/s/ Kevin S. Wiley, Sr.